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UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

AMANDA HOUGHTON, CHARLES
DOUGLAS, AND SUSAN FRANKLIN, on
behalf of themselves and all others similarly
situated,

Plaintiffs,

vs.

ROBERT LESHNER; GEOFFREY HAYES;
COMPOUND DAO; AH CAPITAL
MANAGEMENT, LLC; POLYCHAIN
ALCHEMY, LLC; BAIN CAPITAL
VENTURES (GP), LLC; GAUNTLET
NETWORKS, INC.; PARADIGM
OPERATIONS LP,

Defendants.

Case No. 3:22-cv-7781-WHO

**JOINT CASE MANAGEMENT
STATEMENT**

Case Management Conference

Date: December 16, 2025

Time: 2:00 p.m.

Courtroom 2 (videoconference)

Before the Hon. William H. Orrick

14 Pursuant to Fed. R. Civ. P. 16, Local Rule 16-10(d), and the Court's Minute Entry of
15 November 12, 2025, the parties to the above-captioned action hereby jointly submit the following
16 Joint Case Management Statement, reporting progress or changes since the last Case Management
17 Statement was filed on December 31, 2024 (Dkt. 232).

18
19 **1. Case Schedule**

20 On November 26, 2024, Defendants filed a Notice of Appeal concerning the Court's denial
21 of their Motion to Compel Arbitration. *See* Dkt. 215. On January 28, 2025, this Court denied
22 Plaintiffs' Motion for *Chuman* Certification. *See* Dkt. 242. The case was stayed pursuant to
23 *Coinbase, Inc. v. Bielski*, 599 U.S. 736 (2023), during the pendency of Defendants' appeal. The
24 Ninth Circuit affirmed this Court's denial of Defendants' Motion to Compel Arbitration on October
25 21, 2025. *Houghton v. Polychain Alchemy, LLC*, 2025 WL 2965204 (9th Cir. Oct. 21, 2025). The
26 mandate subsequently issued on November 12, 2025. *See* Dkt. 248.
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The Parties propose the following schedule to govern proceedings in this matter going forward:

Event	Date
Class Certification Motion	August 21, 2026
Opposition to Class Certification	October 2, 2026
Close of Fact Discovery	November 6, 2026
Reply in Support of Class Certification	November 13, 2026
Class Certification Hearing	December 2, 2026
Opening Expert Merits Reports (for any issue on which a party bears the burden of proof)	December 16, 2026
Rebuttal Expert Merits Reports	February 5, 2027
Close of Expert Discovery	April 2, 2027
Summary Judgment Motions	April 23, 2027
Summary Judgment Oppositions	June 18, 2027
Summary Judgment Replies	July 16, 2027
Dispositive Motion Hearing	September 1, 2027
Final Pretrial Conference	November 5, 2027 at 2:00 p.m.
Jury Trial	December 6, 2027 at 8:30 a.m.

Plaintiffs reserve the right to seek leave to file an Expert Reply Merits Report. The Parties agree to produce materials relied upon by experts in preparing any expert report within three (3) business days of producing the report at class certification or the merits.

2. Discovery

The Parties are in the process of meeting and conferring regarding discovery issues. The Parties anticipate serving additional written discovery requests. Plaintiffs are also working with third-party subpoena recipients concerning document and data productions and depositions. The Parties will work together to notice and schedule depositions. Should the need arise, the Parties will

1 raise any issues or disputes with the Court pursuant to the procedure outlined in Section 4 of the
2 Court's Standing Order for Civil Cases.

3 **3. Motion for Leave to Amend Complaint**

4 Plaintiffs previously filed a Motion for Leave to Amend on November 4, 2024, which was
5 administratively terminated in light of the discovery stay and pending appeal. *See* Dkts. 202, 244.
6 Plaintiffs intend to file another Motion for Leave to Amend. The Parties are meeting and conferring
7 concerning the proposed amended complaint, including the schedule for any opposition to leave to
8 amend and/or any motions to dismiss.

10 **4. Service of Compound DAO**

11 Pursuant to the Court's order regarding service of the Compound DAO, Plaintiffs submitted
12 a forum post to the Compound Community Forum that became publicly available on December 10,
13 2024. *See* Dkt. Nos. 213, 223. Plaintiffs' position is that under Federal Rule of Civil Procedure
14 12(a)(1), the Compound DAO's deadline to answer or otherwise file a responsive pleading was
15 December 31, 2024. The Compound DAO did not answer or file a responsive pleading by that date.
16 Plaintiffs intend to request entry of default. Defendants disagree with Plaintiffs' characterization of
17 the "Compound DAO," including that it is a juridical entity capable of being served in this matter,
18 and reserve all rights and defenses with respect to Plaintiffs' purported service, any request for
19 entry of default, or otherwise.

22 **5. ADR**

23 The parties are in compliance with ADR L.R. 3-5 and have scheduled a mediation for
24 February 2026.

1 Dated: December 9, 2025

Respectfully submitted,

2 **MORRISON COHEN LLP**

3 /s/ Michael A. Mix

4 Jason P. Gottlieb (*pro hac vice*)

5 jgottlieb@morrisoncohen.com

6 Michael A. Mix (*pro hac vice*)

7 mmix@morrisoncohen.com

8 Vani Upadhyaya (*pro hac vice*)

vupadhyaya@morrisoncohen.com

9 909 Third Ave.

New York, NY 10022

Telephone: (212) 735-8600

10 **LONDON & NAOR P.C.**

11 Ellen London (325580)

12 elondon@londonnaor.com

13 1999 Harrison St., Suite 2010

14 Oakland CA 94612

15 Telephone: (415) 862-8495

16 *Attorneys for Defendants Robert Leshner, Geoffrey*
17 *Hayes, and Gauntlet Networks, Inc.*

18 **LATHAM & WATKINS LLP**

19 /s/ Morgan E. Whitworth

20 Morgan E. Whitworth (304907)

21 morgan.whitworth@lw.com

22 505 Montgomery Street, Suite 2000

23 San Francisco, CA 94111

24 Telephone: (415) 391-0600

25 Douglas K. Yatter (236089)

26 douglas.yatter@lw.com

27 Benjamin Naftalis (*pro hac vice*)

28 benjamin.naftalis@lw.com

1271 Avenue of the Americas

New York, NY 10020

Telephone: (212) 637-2200

Susan E. Engel (*pro hac vice*)

susan.engel@lw.com

555 Eleventh Street, N.W., Suite 100

Washington, D.C. 20004

Telephone: (202) 637-2200

Attorneys for Defendant
AH Capital Management, L.L.C.

**CLEARY GOTTlieb STEEN & HAMILTON
LLP**

/s/ Samuel Levander

Jennifer Kennedy Park (344888)
jkpark@cgsh.com
1841 Page Mill Rd Suite 250
Palo Alto, CA 94304
Telephone: (650) 815-4100

Roger A. Cooper (*pro hac vice*)
racooper@cgsh.com
Samuel Levander (*pro hac vice*)
slevander@cgsh.com
One Liberty Plaza
New York, NY 10006
Telephone: (212) 225-2000

Attorneys for Defendant Polychain Alchemy, LLC

JENNER & BLOCK LLP

/s/ Kayvan B. Sadeghi

H. An N. Tran (267685)
atran@jenner.com
525 Market Street, 29th Floor
San Francisco, CA 94105
Telephone: (628) 267-6800

Kayvan B. Sadeghi (*pro hac vice*)
ksadeghi@jenner.com
1155 Avenue of the Americas
New York, NY 10036
Telephone: (212) 891-1600

*Attorneys for Defendant
Bain Capital Ventures (GP), LLC*

**SKADDEN, ARPS, SLATE, MEAGHER &
FLOM LLP**

/s/ Zachary M. Faigen

Peter B. Morrison (230148)
peter.morrison@skadden.com
Zachary M. Faigen (294716)
zack.faigen@skadden.com
2000 Avenue of the Stars, Suite 200N
Los Angeles, CA 90067
Telephone: (213) 687-5000

Alexander C. Drylewski (*pro hac vice*)
alexander.drylewski@skadden.com
One Manhattan West
New York, NY 10001

Telephone: (212) 735-3000

Attorneys for Defendant Paradigm Operations LP

GERSTEIN HARROW LLP

/s/ Charles Gerstein

Charles Gerstein (*pro hac vice*)
charlie@gerstein-harrow.com
810 7th Street NE, Suite 301
Washington, DC 20002
Telephone: (202) 670-4809

Jason Harrow (308560)
jason@gerstein-harrow.com
3243B S. La Cienega Blvd.
Los Angeles, California 90016
Telephone: (323) 744-5293

FAIRMARK PARTNERS, LLP

/s/ Michael Lieberman

James Crooks (*pro hac vice*)
jamie@fairmarklaw.com
Michael Lieberman (*pro hac vice*)
michael@fairmarklaw.com
1499 Massachusetts Avenue, NW, #113A
Washington, DC 20005
Telephone: (619) 507-4182

SUSMAN GODFREY L.L.P.

/s/ Nicholas N. Spear

Steven G. Sklaver (237612)
ssklaver@susmangodfrey.com
Oleg Elkhunovich (269238)
oelkhunovich@susmangodfrey.com
Rohit D. Nath (316062)
rnath@susmangodfrey.com
Nicholas N. Spear (304281)
nspear@susmangodfrey.com
1900 Avenue of the Stars, Suite 1400
Los Angeles, California 90067-6029
Telephone: (310) 789-3100
Facsimile: (310) 789-3150

Taylor H. Wilson, Jr. (*pro hac vice*)
twilson@susmangodfrey.com
1000 Louisiana St., Suite 5100
Houston, TX 77002
Telephone: (713) 651-9366
Facsimile: (713) 654-6666

Attorneys for Plaintiffs

ATTESTATION

In compliance with Local Civil Rule 5-1(i)(3), I attest that all other counsel on whose behalf this filing is jointly submitted have approved of and concurred in this filing.

/s/ Nicholas N. Spear

Nicholas N. Spear